

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division

UNITED STATES OF AMERICA) Criminal No. 3:24-cr- 122
)
v.) Conspiracy to Traffic Firearms
) 18 U.S.C. § 933(a)(3)
WILLIAM THOMAS MORTON, JR.,) (Count 1)
a.k.a. "Skillet,")
RAEKWON JAMIL MAHONE,) Possession of Firearm by Convicted Felon
a.k.a. "Truck" a.k.a. "Baby Truck,") 18 U.S.C. § 922(g)(1)
) (Counts 2, 3, 5, 13)
and)
SHAMIR AL-FATIR ABDUR YOUNG,) Illegal Possession of a Machinegun
a.k.a. "Black,") 18 U.S.C. § 922(o)
) (Counts 4, 24)
Defendants.) Possess and Sell Stolen Firearms
) 18 U.S.C. §§ 922(j) and 924(a)(2)
) (Count 6)
)
) Distribution of Controlled Substances
) 21 U.S.C. § 841(a)(1)
) (Counts 7, 8, 11, 17, 20)
)
) Engage in Unlicensed Firearms Dealing
) 18 U.S.C. § 922(a)(1)(A)
) (Counts 9, 10, 15, 18, 21, 23)
)
) Use and Carry Firearm During and In
) Relation To a Drug Trafficking Crime
) 18 U.S.C. § 924(c)
) (Counts 12)
)
) Trafficking of a Firearm to an Out-of-State
) Resident
) 18 U.S.C. § 922(a)(5)
) (Counts 14, 16, 19, 22, 25)
)
) **Forfeiture Allegation**
)

INDICTMENT
AUGUST 2024 TERM - At Richmond, Virginia

THE GRAND JURY CHARGES THAT:

COUNT ONE
(Conspiracy to Traffic Firearms)

Starting before April 1, 2024 and continuing through and including May 7, 2024, in the Eastern District of Virginia and elsewhere within the jurisdiction of this Court, the defendants, WILLIAM THOMAS MORTON, JR., a.k.a. "Skillet," RAEKWON JAMIL MAHONE, a.k.a. "Truck" a.k.a. "Baby Truck," and SHAMIR AL-FATIR ABDUR YOUNG, a.k.a. "Black," did knowingly combine, conspire, confederate and agree with each other and others, known and unknown,

a. to ship, transport, transfer, cause to be transported, and otherwise dispose of one and more firearms, including, to another person, in and affecting interstate and foreign commerce, while knowing and having reasonable cause to believe that the use, carrying, or possession of a firearm by the recipient would constitute a felony (as defined in section 932(a)), in violation of Title 18, United States Code, Section 933(a)(1); and

b. to receive one and more firearms from another person, in and affecting interstate or foreign commerce, while knowing and having reasonable cause to believe that such receipt would constitute a felony, in violation of Title 18, United States Code, Section 933(a)(2).

(In violation of Title 18, United States Code, Section 933(a)(3) and (b).)

COUNT TWO
(Possession of a Firearm by a Convicted Felon)

On or about April 1, 2024, in the Eastern District of Virginia and within the jurisdiction

of this Court, the defendant, WILLIAM THOMAS MORTON, JR., a.k.a. "Skillet," knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm, to wit: a Privately Made Firearm ("PMF"), 9mm pistol, with "80 Percent Arms" printed on the polymer frame, and a Glock slide, bearing serial number BNYN047, in and affecting interstate and foreign commerce.

(In violation of Title 18, United States Code, Section 922(g)(1).)

COUNT THREE

(Possession of a Firearm by a Convicted Felon)

On or about April 1, 2024, in the Eastern District of Virginia and within the jurisdiction of this Court, the defendant, SHAMIR AL-FATIR ABDUR YOUNG, a.k.a. "Black," knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm, to wit: a Privately Made Firearm ("PMF"), 9mm pistol, with "80 Percent Arms" printed on the polymer frame, and a Glock slide, bearing serial number BNYN047, in and affecting interstate and foreign commerce.

(In violation of Title 18, United States Code, Section 922(g)(1).)

COUNT FOUR

(Illegal Possession of a Machinegun)

On or about April 1, 2024, in the Eastern District of Virginia and within the jurisdiction of this Court, the defendant SHAMIR AL-FATIR ABDUR YOUNG, a.k.a. "Black," did knowingly possess a machinegun, specifically, a combination of parts, commonly known as a "switch" and/or "conversion switch," designed and intended for use in converting a weapon to

shoot automatically more than one shot, without manual reloading, by a single function of the trigger.

(In violation of Title 18, United States Code, Section 922(o).)

COUNT FIVE

(Possession of a Firearm by a Convicted Felon)

On or about April 3, 2024, in the Eastern District of Virginia and within the jurisdiction of this Court, the defendant, SHAMIR AL-FATIR ABDUR YOUNG, a.k.a. "Black," knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm, to wit: a Hi-Point Firearms, CF380, .380 caliber pistol, bearing serial number P8094730, in and affecting interstate and foreign commerce.

(In violation of Title 18, United States Code, Section 922(g)(1).)

COUNT SIX

(Possess and Sell Stolen Firearm)

On or about April 3, 2024, in the Eastern District of Virginia, the defendant, SHAMIR AL-FATIR ABDUR YOUNG, a.k.a. "Black," did knowingly possess and sell a stolen firearm, to wit: a Hi-Point Firearms, CF380, .380 caliber pistol, bearing serial number P8094730, which had been shipped and transported in interstate and foreign commerce, knowing and having reasonable cause to believe the firearm was stolen.

(In violation of Title 18, United States Code, Sections 922(j) and 924(a)(2).)

COUNT SEVEN

(Distribution of Cocaine)

On or about April 4, 2024, in the Eastern District of Virginia, the defendant, WILLIAM THOMAS MORTON, JR., a.k.a. "Skillet," did knowingly and intentionally distribute a mixture

and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).)

COUNT EIGHT
(Distribution of Cocaine)

On or about April 8, 2024, in the Eastern District of Virginia, the defendant, WILLIAM THOMAS MORTON, JR., a.k.a. "Skillet," did knowingly and intentionally distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).)

COUNT NINE
(Engage in Unlicensed Firearms Dealing)

On or about April 8, 2024, in the Eastern District of Virginia and within the jurisdiction of this Court, the defendant, RAEKWON JAMIL MAHONE, a.k.a. "Truck" a.k.a. "Baby Truck," aided and abetted by WILLIAM THOMAS MORTON, JR., a.k.a. "Skillet," not being a licensed importer, manufacturer, and dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of importing, manufacturing, and dealing in firearms, and in the course of such business did ship, transport, and receive firearms, to wit: a Springfield XD, .45 caliber pistol, bearing serial number GM461960, in interstate and foreign commerce.

(In violation of Title 18, United States Code, Sections 2 and 922(a)(1)(A).)

COUNT TEN

(Engage in Unlicensed Firearms Dealing)

On or about April 10, 2024, in the Eastern District of Virginia and within the jurisdiction of this Court, the defendant, RAEKWON JAMIL MAHONE, a.k.a. "Truck" a.k.a. "Baby Truck," aided and abetted by WILLIAM THOMAS MORTON, JR., a.k.a. "Skillet," not being a licensed importer, manufacturer, and dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of importing, manufacturing, and dealing in firearms, and in the course of such business did ship, transport, and receive firearms, to wit: a Privately Made Firearm ("PMF"), pf940C, 9mm pistol, bearing no serial number; an American Tactical Imports, Model ALPHA-15, multicaliber pistol, bearing serial number AV01619; and a Rock River Arms, Model LAR 15M, multicaliber rifle, bearing serial number AP101965, in interstate and foreign commerce.

(In violation of Title 18, United States Code, Sections 2 and 922(a)(1)(A).)

COUNT ELEVEN

(Distribution of Fentanyl)

On or about April 23, 2024, in the Eastern District of Virginia, the defendant, WILLIAM THOMAS MORTON, JR., a.k.a. "Skillet," did knowingly and intentionally distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).)

COUNT TWELVE

(Use and Carry a Firearm During and In Relation to a Felony Drug Trafficking Crime)

On or about April 23, 2024, in the Eastern District of Virginia and within the jurisdiction of this Court, the defendant, WILLIAM THOMAS MORTON, JR., a.k.a. "Skillet," did

knowingly use and carry a firearm, during and in relation to a felony drug trafficking crime for which he may be prosecuted in a court of the United States, to wit: distribution of fentanyl, as charged in Count Eleven, incorporated by reference herein.

(In violation of Title 18, United States Code, Section 924(c).)

COUNT THIRTEEN

(Possession of a Firearm by a Convicted Felon)

On or about April 23, 2024, in the Eastern District of Virginia and within the jurisdiction of this Court, the defendant, WILLIAM THOMAS MORTON, JR., a.k.a. "Skillet," knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm, to wit: a Hi-Point Firearms, model C9, 9mm caliber pistol, bearing serial number P1345735, in and affecting interstate and foreign commerce.

(In violation of Title 18, United States Code, Section 922(g)(1).)

COUNT FOURTEEN

(Trafficking of a Firearm to an Out-of-State Resident)

On or about April 23, 2024, in the Eastern District of Virginia and within the jurisdiction of this Court, the defendant, WILLIAM THOMAS MORTON, JR., a.k.a. "Skillet," not being a licensed importer, manufacturer, dealer, and collector of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully transfer, sell, trade, give, transport, and deliver a firearm, to wit: a Hi-Point Firearms, model C9, 9mm caliber pistol, bearing serial number P1345735, to a person, said person not being a licensed importer, manufacturer, dealer, and collector of firearms, within the meaning of Chapter 44, Title 18, United States Code, and knowing and with reasonable cause to believe that said person was not then residing in the

Commonwealth of Virginia, the State in which the defendant was residing at the time of the aforesaid transfer, sale, trade, giving, transportation, and delivery of the firearm.

(In violation of Title 18, United States Code, Section 922(a)(5).)

COUNT FIFTEEN

(Engage in Unlicensed Firearms Dealing)

On or about April 24, 2024, in the Eastern District of Virginia and within the jurisdiction of this Court, the defendant, RAEKWON JAMIL MAHONE, a.k.a. "Truck" a.k.a. "Baby Truck," not being a licensed importer, manufacturer, and dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of importing, manufacturing, and dealing in firearms, and in the course of such business did ship, transport, and receive firearms, to wit: a Smith and Wesson, Model M&P Shield, 9mm pistol, bearing serial number JNV3819; and a DPMS Panther, 7.62 caliber rifle, bearing serial number DA15006202, in interstate and foreign commerce.

(In violation of Title 18, United States Code, Section 922(a)(1)(A).)

COUNT SIXTEEN

(Trafficking of a Firearm to an Out-of-State Resident)

On or about April 24, 2024, in the Eastern District of Virginia and within the jurisdiction of this Court, the defendant, RAEKWON JAMIL MAHONE, a.k.a. "Truck" a.k.a. "Baby Truck," not being a licensed importer, manufacturer, dealer, and collector of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully transfer, sell, trade, give, transport, and deliver firearms, to wit: a Smith and Wesson, Model M&P Shield, 9mm pistol, bearing serial number JNV3819; and a DPMS Panther, 7.62 caliber rifle, bearing serial number

DA15006202, to a person, said person not being a licensed importer, manufacturer, dealer, and collector of firearms, within the meaning of Chapter 44, Title 18, United States Code, and knowing and with reasonable cause to believe that said person was not then residing in the Commonwealth of Virginia, the State in which the defendant was residing at the time of the aforesaid transfer, sale, trade, giving, transportation, and delivery of the firearm.

(In violation of Title 18, United States Code, Section 922(a)(5).)

COUNT SEVENTEEN

(Distribution of Fentanyl)

On or about April 26, 2024, in the Eastern District of Virginia, the defendant, WILLIAM THOMAS MORTON, JR., a.k.a. "Skillet," did knowingly and intentionally distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).)

COUNT EIGHTEEN

(Engage in Unlicensed Firearms Dealing)

On or about April 26, 2024, in the Eastern District of Virginia and within the jurisdiction of this Court, the defendant, RAEKWON JAMIL MAHONE, a.k.a. "Truck" a.k.a. "Baby Truck," not being a licensed importer, manufacturer, and dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of importing, manufacturing, and dealing in firearms, and in the course of such business did ship, transport, and receive firearms, to wit: a Glock 27, 40 caliber pistol, bearing serial number BSRP153, in interstate and foreign commerce.

(In violation of Title 18, United States Code, Section 922(a)(1)(A).)

COUNT NINETEEN

(Trafficking of a Firearm to an Out-of-State Resident)

On or about April 26, 2024, in the Eastern District of Virginia and within the jurisdiction of this Court, the defendant, RAEKWON JAMIL MAHONE, a.k.a. "Truck" a.k.a. "Baby Truck," not being a licensed importer, manufacturer, dealer, and collector of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully transfer, sell, trade, give, transport, and deliver a firearm, to wit: a Glock 27, 40 caliber pistol, bearing serial number BSRP153, to a person, said person not being a licensed importer, manufacturer, dealer, and collector of firearms, within the meaning of Chapter 44, Title 18, United States Code, and knowing and with reasonable cause to believe that said person was not then residing in the Commonwealth of Virginia, the State in which the defendant was residing at the time of the aforesaid transfer, sale, trade, giving, transportation, and delivery of the firearm.

(In violation of Title 18, United States Code, Section 922(a)(5).)

COUNT TWENTY

(Distribution of Heroin/Fentanyl Mixture)

On or about May 2, 2024, in the Eastern District of Virginia, the defendant, WILLIAM THOMAS MORTON, JR., a.k.a. "Skillet," did knowingly and intentionally distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and a detectable amount of fentanyl, a Schedule II controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).)

COUNT TWENTY-ONE

(Engage in Unlicensed Firearms Dealing)

On or about May 3, 2024, in the Eastern District of Virginia and within the jurisdiction of

this Court, the defendant, RAEKWON JAMIL MAHONE, a.k.a. "Truck" a.k.a. "Baby Truck," not being a licensed importer, manufacturer, and dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of importing, manufacturing, and dealing in firearms, and in the course of such business did ship, transport, and receive firearms, to wit: a Glock pistol, Model 23 Gen4, 40 caliber pistol, bearing serial number VZS231, in interstate and foreign commerce.

(In violation of Title 18, United States Code, Section 922(a)(1)(A).)

COUNT TWENTY-TWO

(Trafficking of a Firearm to an Out-of-State Resident)

On or about May 3, 2024, in the Eastern District of Virginia and within the jurisdiction of this Court, the defendant, RAEKWON JAMIL MAHONE, a.k.a. "Truck" a.k.a. "Baby Truck," not being a licensed importer, manufacturer, dealer, and collector of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully transfer, sell, trade, give, transport, and deliver a firearm, to wit: a Glock, Model 23 Gen4, 40 caliber pistol, bearing serial number VZS231, to a person, said person not being a licensed importer, manufacturer, dealer, and collector of firearms, within the meaning of Chapter 44, Title 18, United States Code, and knowing and with reasonable cause to believe that said person was not then residing in the Commonwealth of Virginia, the State in which the defendant was residing at the time of the aforesaid transfer, sale, trade, giving, transportation, and delivery of the firearm.

(In violation of Title 18, United States Code, Section 922(a)(5).)

COUNT TWENTY-THREE

(Engage in Unlicensed Firearms Dealing)

On or about May 7, 2024, in the Eastern District of Virginia and within the jurisdiction of this Court, the defendant, RAEKWON JAMIL MAHONE, a.k.a. "Truck" a.k.a. "Baby Truck," not being a licensed importer, manufacturer, and dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of importing, manufacturing, and dealing in firearms, and in the course of such business did ship, transport, and receive firearms, to wit: a Glock 23, 40 caliber pistol, modified as a machinegun, bearing serial number AGEN905, in interstate and foreign commerce.

(In violation of Title 18, United States Code, Section 922(a)(1)(A).)

COUNT TWENTY-FOUR

(Illegal Possession of a Machinegun)

On or about May 7, 2024, in the Eastern District of Virginia and within the jurisdiction of this Court, the defendant RAEKWON JAMIL MAHONE, a.k.a. "Truck" a.k.a. "Baby Truck," did knowingly possess a machinegun, specifically, a combination of parts, commonly known as a "switch" and/or "conversion switch," designed and intended for use in converting a weapon to shoot automatically more than one shot, without manual reloading, by a single function of the trigger.

(In violation of Title 18, United States Code, Section 922(o).)

COUNT TWENTY-FIVE

(Trafficking of a Firearm to an Out-of-State Resident)

On or about May 7, 2024, in the Eastern District of Virginia and within the jurisdiction of

this Court, the defendant, RAEKWON JAMIL MAHONE, a.k.a. "Truck" a.k.a. "Baby Truck," not being a licensed importer, manufacturer, dealer, and collector of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully transfer, sell, trade, give, transport, and deliver a firearm, to wit: a Glock 23, 40 caliber pistol, modified as a machinegun, bearing serial number AGEN905, to a person, said person not being a licensed importer, manufacturer, dealer, and collector of firearms, within the meaning of Chapter 44, Title 18, United States Code, and knowing and with reasonable cause to believe that said person was not then residing in the Commonwealth of Virginia, the State in which the defendant was residing at the time of the aforesaid transfer, sale, trade, giving, transportation, and delivery of the firearm.
(In violation of Title 18, United States Code, Section 922(a)(5).)

FORFEITURE ALLEGATION

Pursuant to Rule 32.2 Fed. R. Crim. P., the defendants are hereby notified that if convicted of any of the offenses charged in Count One of this Indictment, they shall forfeit any property constituting, or derived from any proceeds, the defendants obtained, directly or indirectly, as a result of the offense charged; and any property used, or intended to be used, in any manner or part, to commit or to facilitate the commission of the offense, except that for any forfeiture of any firearm or ammunition pursuant to this section, section 924(d) shall apply.

The defendants are further notified that if convicted of any of the offenses charged in Counts Two through Six, Nine, Ten, Twelve through Sixteen, Eighteen, Nineteen, and Twenty-one through Twenty-five, of this Indictment, they shall forfeit any firearm or ammunition involved in or used in any knowing violation of the offense charged.

The defendants are also notified that upon conviction of any of the offenses charged in Counts Seven, Eight, Eleven, Seventeen, and Twenty of this Indictment, the defendants shall forfeit to the United States any property constituting, or derived from any proceeds, the defendants obtained, directly or indirectly, as a result of the offense charged; and any property used, or intended to be used, in any manner or part, to commit or to facilitate the commission of the offense.

If the property subject to forfeiture cannot be located, the United States will seek an order forfeiting substitute assets.

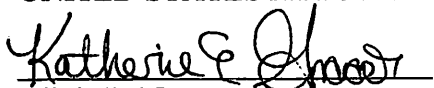
(All in accordance with Title 18, United States Code, Sections 924(d), incorporated by Title 28, United States Code, Section 2461(c), 934(a), and Title 21, United States Code, Section 853.)

A TRUE BILL

FOR PERSON

JESSICA D. ABER
UNITED STATES ATTORNEY

By:


Olivia L. Norman
Assistant United States Attorney

Katherine E. Groover
Special Assistant United States Attorney